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Attorneys for Petitioner and Plaintiff,
Center for American Liberty, Inc.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF LOS ANGELES — STANLEY MOSK COURTHOUSE**

| | |
|---|---|
| **Center for American Liberty**, a Virginia Not for Profit corporation;<br><br>Petitioner and Plaintiff<br><br>vs.<br><br>**City of Los Angeles; Eric Michael Garcetti,** in his official capacity as Mayor of the City of Los Angeles; and DOES 1 through 100, inclusive;<br><br>Respondents and Defendants. | Case No.:<br>Judge:<br>Dept:<br><br>UNLIMITED JURISDICTION<br><br>**Verified Petition for Writ of Mandate; Complaint for Declaratory & Injunctive Relief**<br>[Gov. Code §§ 6250 et seq.] |

Petitioner and Plaintiff Center for American Liberty, ("CAL") alleges as follows:

1. In this action, CAL seeks to enforce its right to obtain public records pursuant to the California Public Records Act, Government Code[1] section 6250 *et seq*. ("CPRA").
2. On June 3, 2020, CAL submitted a CPRA request to Respondent City of Los Angeles ("City"). The June 3, 2020 requests sought records of the "science" or "data" behind the City's Shelter in Place, Face Covering and Cancel Mass Gathering orders between October 1, 2019 to June 3, 2020. A true and correct copy of Petitioner's June 3, 2020 Public Records Act ("PRA") is attached hereto as **Exhibit A**.

[1] All undesignated code references are to the Government Code.

3. City violated CAL's right to obtain public records by not adequately responding to CAL's requests.

## PARTIES

4. Petitioner and Plaintiff **Center for American Liberty,** (Petitioner or CAL) is a nonprofit public benefit corporation organized under the laws of Virginia.
5. Respondent and Defendant City of Los Angeles ("Respondent" or "City") is the public entity that includes the Office of the Mayor and it is a local agency as defined by the CPRA. On information and belief the Office of the Mayor are part of Respondent City.
6. Respondent and Defendant **Eric Michael Garcetti** ("Garcetti") is the Mayor of the City of Los Angeles. Garcetti has a ministerial duty to comply with the CPRA on City's behalf.
7. The true names of Respondent and Defendant DOES 1 through 100, inclusive are unknown to Petitioner who therefore brings this Petition and Complaint against DOES 1 through 100, inclusive by such fictitious names, and will seek leave of this Petition and Complaint to show their true names, identities, and capacities when they have been determined.
8. DOES 1 through 100 include City officials, employees, contractors, and other agents who have public records relating to City business in their possession.
9. Each Respondent and Defendant, including the DOE Respondents and Defendants, are each other's agents and at all relevant times were acting as each other's agents. Together, all Respondents and Defendants are the "Respondents".

## JURISDICTION

10. Pursuant to Government Code section 6258, "any person may institute proceedings for injunctive or declarative relief or writ of mandate in any court of competent jurisdiction to enforce his or her right to inspect or to receive a copy of any public record or class of public records under [the CPRA]."
11. Petitioner is a person, as defined by the code, and is suing to enforce its right to receive public records. Petitioner has standing to bring this action. *Connell v. Super. Ct. (Intersource, Inc.)* (1997) 56 CA4th 601, 611.

12. The Los Angeles County Superior Court is the proper venue because the acts complained of which are the subject of this Petition and Complaint, have all occurred or will all occur in the County of Los Angeles, State of California. The relief sought in this Petition and Complaint is within the jurisdiction of this Court.

**SUMMARY OF PERTINENT CALIFORNIA PUBLIC RECORDS ACT PROVISIONS**

13. In enacting the CPRA, the Legislature declared that "access to information concerning the conduct of the people's business is a fundamental and necessary right of every person in this state." (§ 6250)

14. It requires that a local agency respond to a request for public records within 10 days to inform the requestor whether it possess disclosable public records that are responsive to the request (§ 6253(c).) A local agency is permitted one fourteen-day extension only if one of four specified "unusual circumstances" exists. (§ 6253(c)(1)-(4).) Responsive records must be disclosed "promptly." (§ 6253(b).)

15. A local agency has a duty to assist the requestor in formulating a focused and effective request. (§ 6253.1)

16. Local agencies may not charge more than the agency's "direct costs of duplication" for copies of records. (§ 6253(b).) Direct costs of duplication are limited to the costs of making copies and do not include time spent searching for and reviewing records. (*North County Parents Organization v. Dept. of Education* (1994) 23 Cal.App.4th 144, 147.)

17. Further, an agency may not charge a requestor of responsive documents for the act of searching for those documents or for review and redaction of any portion of a responsive document where the agency is claiming it is subject to an exemption or privilege. *National Lawyers Guild v. City of Hayward, et al* (2020) 9 Cal. 5th 488.

18. A local agency must, upon request, provide information in an electronic format (§ 6253.9(a).)

19. When being applied to grant access to information, the CPRA must be interpreted broadly, and when being applied to deny access to information, CPRA exemptions must be interpreted narrowly (Cal. Const., art. I, § 3).

20. When public officials conduct the people's business on private devices and accounts such as texting on privately owned cell phones or sending email using privately held electronic mail accounts, these records are subject to disclosure under the CPRA as if they were created on agency-owned devices. (*City of San Jose v. Superior Court (Smith)* (2017) 2 Cal. 5th 608.)

**CAL'S JUNE 3, 2020 CPRA REQUEST**

21. On June 3, 2020, CAL requested public records from City. The written request was submitted by CAL's Counsel, and sought two main separate categories of records. In Request No. I the following was requested:

> Pursuant to the California Public Records Act, Govt. Code §§ 6250-6276.48, Center for American Liberty ("Requestor") respectfully requests to inspect all public records in the possession or control of the City of Los Angeles ("City") office for the following:
>
> 1. Each set of data (including but not limited to scientific studies, peer reviews, medical studies, analysis, hospital data, public health studies, health care statistics, memorandum, letters, correspondence, directives, etc.) upon which the City based its decision to issue any and all "Shelter in Place", "Face Covering", "Cancel Mass Gathering" and any other COVID-19 orders / recommendations from October 1, 2019 to the present date regarding the COVID-19 pandemic, including but not limited to the City's orders and recommendations dated March 4, March 12, March 15, March 17, March 21, March 24, March 25, March 30, March 31, April 7, April 10, April 17, April 24, April 22, April 27, May 4, May 7, May 19 and June 1, 2020 any prior or subsequent orders (as set forth on https://www.lamayor.org/COVID19Orders);
>
> 2. Each correspondence, including electronic communication and in paper format, regarding each renewal or modification of any Order; and
>
> 3. A copy of any and all requests for similar records under the California Public Records Act received by the City.
>
> These requests are for any and all writings and communications (including but not limited to, letters, electronic communications, e-mails, text messages, notes, memorandums, messages) whether or not those communications are stored in the City's files and/or servers or on personal devices / accounts such as private electronic mail accounts or cellular telephones. *City of San Jose v. Superior Court (Smith)* (2017) 2 Cal. 5th 608.

The time frame for these Requests are October 1st, 2019 and the date of this letter (June 3, 2020).

Exhibit A, pages one and two.

22. The June 3, 2020 PRA request (Exhibit A) also (as Request No. II) sought records disclosing how the City arrives at its "direct" costs per page for photocopying charges as allowed under Government Code § 6253 (b).

23. Initially CAL directed its PRA (Exhibit A) to both the Office of the Mayor and the City Clerk. On June 4, 2020 the City Clerk's office issued a response, via the city's Public Records portal, to CAL that it had no responsive documents and all responsive documents and responses would come directly from the Office of the Mayor. Attached hereto as **Exhibit B** is a true and correct copy of the message via the City's portal from the City of Los Angeles, City Clerk's office to CAL.

24. On or about June 4, 2020 CAL issued an identical PRA to the Los Angeles Emergency Management Department. Attached hereto as **Exhibit C** is a true and correct copy of the PRA dated June 4, 2020 to the Los Angeles Emergency Management Department.

25. On June 4, 2020 the office of Emergency Management Department issued to CAL a notice via Electronic Mail that all such inquiries (PRAs) should be directed to the Office of the Mayor for the City of Los Angeles. Attached hereto as **Exhibit D** is a true and correct copy of the electronic mail message from the Emergency Management Department to CAL's counsel.

26. City (the Mayor's office) first responded to CAL's request on June 15, 2020 but did not produce any records that day. Rather City acknowledged receipt of CAL's PRA. It stated it would provide "non-exempt" responsive records by July 15, 2020. A true and correct copy of this June 15, 2020 letter is attached hereto as **Exhibit E**.

27. On or about July 15, 2020 responded to CAL's PRA via a letter stating that that it was disclosing what it described as "responsive" documents. A true and correct copy of the City's July 15, 2020 letter is attached hereto as **Exhibit F**. City responded that it was responding for both the Office of the Mayor and the City of Los Angeles Emergency

Management Department. It stated that certain responsive documents were being withheld on the basis that:

> "(i) records that are subject to attorney-client privilege and/or attorney work product doctrine; (ii) records whose disclosure would constitute an unwanted invasion of personal privacy, and may be withheld under Government Code §§ 6254(c), 6254.3, and/or 6254.20; (iii) records that are pre-decisional and advisory in nature and may be withheld pursuant to the deliberative process privilege pursuant to Government Code § 6255; and (iv) records for which the public interest served by withholding the records clearly outweighs the public interest served by disclosure, and may be withheld pursuant to Government Code § 6255."

City has withheld responsive documents by citing and claiming exemptions and/or privileges improperly.

28. Also, City's "response" in Exhibit F was not actually a disclosure of "responsive' records. City disclosed several pages of hyperlinks in Excel pages that it claimed were responsive to CAL's PRA request. Attached hereto as **Exhibit G** is a true and correct copy of the 18 pages of hyperlinks the City disclosed in Excel (Hyperlinks on pages for "Facebook" not included in Exhibit G due to length). Each of the Excel pages were entitled "Instagram", "Twitter", "Facebook", "Next Door" and "EMD Website". Each hyperlink was an announcements and proclamations such as (for example): "Novel Coronavirus", "Get the Facts #7" and "Mayor signed Declaration of Local Emergency". None of these disclosed documents were actually responsive to CAL's PRA for the "data" or "science" behind the orders and recommendations regarding the COVID-19 pandemic. As an example, attached hereto as **Exhibit H** is a true and correct copy of the Instagram page hyperlink entitled "Mayor signed Declaration of Local Emergency".

29. City also disclosed a page in Excel entitled "LA City NotifyLA Messages". Attached hereto as **Exhibit I** (with "Delivery Method" columns removed from Exhibit due to length) is a true and correct copy of the Excel spreadsheet. Each of the "Messages" is not the responsive documents regarding the "data" as requested by Petitioner CAL.

30. Petitioner is also informed and believes and thereon alleges that City has failed to demand that its employees, including Respondent Eric Garcetti, search for and produce responsive records they possess in their personal email accounts and devices as required under *City of San Jose v. Superior Court (Smith)* (2017) 2 Cal. 5th 608 and as specifically requested by Petitioner.

31. On information and belief, City did not respond to CAL's Request No. I, items 2 & 3 or Request No. II. City has not provided any further documents in response to CAL's PRA.

**FIRST CAUSE OF ACTION**
(Writ of Mandate — Gov. Code § 6258)
Against all Respondents

32. Petitioner incorporates by reference all prior allegations.

33. Respondent City is a local agency and is required to comply with the CPRA. As agents of City, all other Respondents have a ministerial duty to comply with the CPRA on City's behalf.

34. Petitioner requests that a Writ of Mandate issue to compel Respondents to search for and disclose the public records that are responsive to Petitioner's request and described herein, including those improperly withheld on the basis of an alleged exemption and/or privilege.

35. Petitioner's effort to obtain the records without litigation have been unsuccessful, and Petitioner has no further administrative remedies. There is no other adequate remedy in the ordinary course of law. Indeed, the CPRA specifically authorizes writ of mandate as a remedy for CPRA violations.

**SECOND CAUSE OF ACTION**
(Declaratory Relief — Gov. Code § 6258)
Against all Respondents

36. Petitioner incorporates by reference all prior allegations.

37. There is an actual and justiciable controversy between the parties as to whether Respondents' actions have complied with the California Public Records Act.

38. Petitioner alleges that Respondents have committed the following CPRA violations:

a. On information and belief, failure to conduct a proper search for responsive records (including those on personal devices or in private accounts) in response to CAL's PRA requests.

b. Failure to make a sufficient written determination as to whether City possesses disclosable public records (including those in City officials' private electronic messaging (e-mail) or text messages (cellular telephones) possession) responsive to Petitioner's requests even after taking more than the maximum 10 days (plus any 14-day extension) allowed under Government Code § 6253(a);

c. Failure to disclose records responsive to CAL's PRA requests at all;

d. Failure to disclose records responsive to CAL's PRA requests that are not properly subject to an exemption under the California Public Records Act;

e. Failure to disclose records that are in its constructive possession; and

f. Failure to "promptly" disclose responsive public records as required by the Code;

39. There is an actual controversy with respect to these violations because Respondents dispute the factual basis for the violation and/or whether the actions described violate the CPRA.

40. Declaratory relief is necessary to resolve these controversies and determine whether Respondents have violated the CPRA as described above.

41. The CPRA specifically authorizes declaratory relief.

**THIRD CAUSE OF ACTION**
(Injunctive Relief — Gov. Code § 6258)
Against all Respondents

42. Petitioner incorporates by reference all prior allegations.

43. The CPRA specifically authorizes injunctive relief as a remedy for CPRA violations.

44. The CPRA requires disclosure of public records regardless of whether the records are in the responding agency's actual possession. Records in the possession of an agency's employees or elected officials are public records even if the records are not under the agency's immediate control.

45. Charging improper and/or excessive fees frustrates the purpose of the CPRA and serves to discourage members of the public from requesting public records and participating in activities related to their constitutional right of public oversight.

46. Petitioner seeks injunctive relief to

a. Compel City to request that its employees and officials provide all records they possess that are responsive to CAL's request;

b. Compel the individually named respondents to disclose all public records responsive to CAL's request that are in their possession;

c. Compel City to disclose all responsive records not properly subject to an exemption or privilege; and/or

d. Prohibit City from charging improper and/or excessive fees before disclosing public records;

47. There is no monetary compensation that could adequately compensate Petitioner or any other affected party for the infringement of this right.

48. Injunctive relief is necessary to prevent ongoing and future infringement of the public's right to receive public records from Respondents in a timely fashion and, on information and belief, as a consequence of Respondents' demand for excessive duplication fees. Petitioner requests injunctive relief to ensure Respondents' compliance with the CPRA.

**PRAYER FOR RELIEF**

Wherefore, Petitioner prays that this court:

As to the First Cause of Action:

1. Issue Peremptory and/or Alternative Writ of Mandate ordering Respondents to promptly conduct a proper search for responsive records and to disclose to Petitioner all improperly withheld records, including responsive records contained on City's employee and officials' personal devices.

2. Issue a Peremptory and/or Alternative Writ of Mandate to (a) order City to ensure that its employees search their personal email accounts and electronic devices for records responsive to Petitioner's request; and (b) order each individually named Respondent(s) to search his or her personal email accounts and electronic devices for records responsive to Petitioner's request; and
3. Issue a Peremptory and/or Alternative Writ of Mandate to (a) order Respondent **Garcetti** to search all his personal email accounts and electronic devices for records responsive to Petitioner's request and to disclose them to Petitioner.

As to the Second Cause of Action:

4. Enter a declaratory judgment that Respondents violated the CPRA by
    a) Failing to search for and disclose responsive public records that that City employees and officials possess in City's physical and electronic files;
    b) Failing to search for and disclose responsive public records that that City employees and officials possess in their personal files, email accounts, and electronic devices; and
    c) Failing to "promptly" disclose the records that are responsive to Petitioner's CPRA request.

As to the Third Cause of Action:

5. Issue an order compelling Respondents and each of them (except for Respondent City) to search their private email accounts, computers, and other electronic devices for public records that are responsive to Petitioner's request and disclose same to Petitioner;
6. Issue an order compelling City to search for and disclose to Petitioner all responsive records not subject to any proper claim of exemption or privilege; and
7. Issue a permanent injunction prohibiting City from charging improper fees for photocopying, compilation, extraction, or programming prior to disclosing records that are responsive to a CPRA request;

As to all Causes of Action:

8. Award Petitioner's attorneys' fees and costs reasonably incurred in this action; and

9. For such other and further relief as the Court deems proper.

Dated: September 17, 2020

Respectfully submitted,
LAW OFFICE OF CRAIG P. ALEXANDER

By: /s/

Craig P. Alexander
Attorneys for Petitioner and Plaintiff
Center for American Liberty, Inc.

## VERIFICATION

I, Mark Trammell, declare that I am Executive Director of Center for American Liberty, the Petitioner in the above-entitled action. I have read the foregoing VERIFIED PETITION FOR WRIT OF MANDATE; COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEf and know the contents thereof to be true of my own knowledge, except as to those statements made upon information and belief, and as to those I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 17, 2020 in Frederick, MD.

Mark Trammell

## TABLE OF EXHIBITS

| Exhibit | Description | Reference |
|---|---|---|
| **A** | CAL's June 3, 2020 CPRA Request. | **¶ 2** |
| **B** | E-mail from Los Angeles City Clerk to CAL's counsel on June 4, 2020. | **¶ 23** |
| **C** | CAL's June 4, 2020 PRA to Los Angeles Emergency Management Department. | **¶24** |
| **D** | June 4, 2020 Electronic mail from City's office of Emergency Management Department to CAL. | **¶ 25** |
| **E** | June 15, 2020 letter from City (Mayor's office) to CAL's counsel | **¶ 26** |
| **F** | July 15, 2020 letter from City to CAL's counsel. | **¶ 27** |
| **G** | Excel pages of hyperlinks sent by City to CAL's counsel. | **¶ 28** |
| **H** | Sample of document from hyperlinks entitled "Mayor signed Declaration of Local Emergency" | **¶ 28** |
| **I** | Pages of Excel listings from City entitled "LA CityNotify" messages. | **¶ 29** |

# EXHIBIT “A”

# *Law Offices of Craig P. Alexander*

*24681 La Plaza, Suite 250*
*Dana Point, CA 92629*
*Office: 949-481-6400 Facsimile: 949-242-2545*
*E-mail: craig@craigalexanderlaw.com*


**VIA ELECTRONIC (MAYOR.HELPDESK@LACITY.ORG & CITYCLERK@LACITY.ORG) ONLY**

June 3, 2020

The Honorable Eric Garcetti
Office of the Mayor
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012
Atten: Public Records Act Requests

Ms. Holly Wolcott
Office of the City Clerk
City of Los Angeles
200 N. Spring Street, Room 360
Los Angeles, CA 90012
Atten: Public Records Act Requests

RE: California Public Records Act Request in re Corona Virus Pandemic / COVID-19 – Public Health orders regarding "Shelter in Place", "Face Covering", "Cancel Mass Gathering" and any other COVID-19 orders.

Dear Mr. Mayor and Ms. Wolcott:

This letter is being sent on behalf of the Center for American Liberty. I request you direct this letter to the responsible personnel to respond to my client's CPRA requests.

**PUBLIC RECORDS ACT REQUEST NO. I**

**Documents upon which the City of Los Angeles based its "Shelter in Place", "Face Covering", "Cancel Mass Gathering" and any other COVID-19 orders and recommendations during the corona virus (COVID-19) pandemic.**

Pursuant to the California Public Records Act, Govt. Code §§ 6250-6276.48, Center for American Liberty ("Requestor") respectfully requests to inspect all public records in the possession or control of the City of Los Angeles ("City") office for the following::

1. Each set of data (including but not limited to scientific studies, peer reviews, medical studies, analysis, hospital data, public health studies, health care statistics, memorandum, letters, correspondence, directives, etc.) upon which the City based its decision to issue any and all "Shelter in Place", "Face Covering", "Cancel Mass Gathering" and any other COVID-19 orders / recommendations from October 1, 2019 to the present date regarding the COVID-19 pandemic, including but not limited to the City's orders and recommendations dated March 4, March 12, March 15, March 17, March 21, March 24, March 25, March 30, March 31, April 7, April 10, April 17, April 24, April 22, April 27, May 4, May 7, May 19 and June 1, 2020 any prior or subsequent orders (as set forth on https://www.lamayor.org/COVID19Orders);
2. Each correspondence, including electronic communication and in paper format, regarding each renewal or modification of any Order; and
3. A copy of any and all requests for similar records under the California Public Records Act received by the City.

These requests are for any and all writings and communications (including but not limited to, letters, electronic communications, e-mails, text messages, notes, memorandums, messages) whether or not those communications are stored in the City's files and/or servers or on personal devices / accounts such as private electronic mail accounts or cellular telephones. *City of San Jose v. Superior Court (Smith)* (2017) 2 Cal. 5th 608.

The time frame for these Requests are October 1st, 2019 and the date of this letter (June 3, 2020).

**PUBLIC RECORDS ACT REQUEST NO. II**
**FOR DOCUMENTS RELATED TO THE CITY'S**
**FINDINGS OF ITS ALLOWED "DIRECT" COSTS PER GOVERNMENT**
**CODE SECTION 6253 (B).**

Since the Public Records Request Act allows the City to only charge its "direct" costs for photocopying, please disclose how (including backup costs information or studies **not** just the City's formal policy on photocopy / duplication charges) the City arrives at its "direct" cost per page for photocopying charges. Please consider this request to be a separate Public Records Act Request.

**REQUEST FOR INFORMATION IN ELECTRONIC FORMAT PURSUANT TO**
**GOVERNMENT CODE SECTION 6253.9 (A) (2) & (E).**

My client is seeking these records in any and all electronic formats your office keeps them in. Under the Public Records Act, the City's office is required to deliver the information in whatever electronic format it is in no matter whether it is Excel, Word, WordPerfect or some other program or programs. Government Code section 6253.9 (a) (2) & (e). **My client's request extends to receipt of this information in the electronic format your office maintains these records in.** Delivery of this information to me by

electronic mail (craig@craigalexanderlaw.com) or via a thumb drive or via a disk is fine. I can supply the City with a thumb drive if needed. *Please advise what electronic format these records are kept in.*

In addition, if there are documents that satisfy this request that are in **both** electronic and paper formats, my client offers to receive the electronic version of those records and forgo inspection and potential photocopying of those paper copies. It is hoped that this will save the City and my client's time, trouble and expense.

If you anticipate that data compilation, extraction, or programming will be required to satisfy a request (per Section 6253.9(b)), please provide a written estimate and justification for same. Given the high profile of this matter with the public and the recentness of the date of any responsive records (October 1, 2019 to June 3, 2020), a compilation, extraction or programming should not be required to obtain responsive documents. In addition on May 28, 2020 the California Supreme Court ruled that an agency may not charge a requestor of responsive documents for the act of searching for those documents or for review and redaction of any portion of a responsive document where the agency is claiming it is subject to an exemption or privilege. *National Lawyers Guild v. City of Hayward, et al* (2020) 2020 WL 2761057 (Case No. S252445) _____ Cal. 5th _____.

**REQUEST FOR INSPECTION OF DOCUMENTS**

For any records not delivered electronically, once my client's agent and/or I have had an opportunity to inspect these records, we will designate which documents we will wish to obtain copies from your office and its agents, employees, consultants, etc. If a document exists in both electronic and paper formats, my client selects to receive a copy of the electronic version of the document. This should save both your office time and funds in duplication time and costs and my client duplication costs.

The California Public Records Act requires the City's office to "reveal the general nature of the documents withheld," and to "set forth the names and titles or positions of each person responsible for the denial." Cal. Govt. Code Section 6253 (d). I emphasize my client's request for a specific response and all applicable exemptions to the request. A blanket list of exemptions that may or may not apply to the request coupled with a failure to indicate the existence of documents responsive to the request denies us the ability to evaluate whether the City has justifiably withheld responsive documents. Denying my client this opportunity frustrates the Legislature's primary purpose in enacting the California Public Records Act, which is to "maximize public access to agency records."

We agree that after our inspection of documents made available, to pay the direct cost of duplicating any and all responsive writings we request to have copied in accordance with Section 6253(b). However we will not pay for any charges related to searching, reviewing or redacting documents or portions thereof. Cal. Govt. Code Section 6253(b).

There is no question that your office is a public entity subject to the Public Records Act pursuant to Government Code section 6252 and it must comply with the Request as set forth under the Act.

Terms utilized that are defined by the California Public Records Act should be given their full meaning. Thus, for example, a request for any "writing" includes a request for "any handwriting, typewriting, printing, Photostatting, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored. Cal. Govt Code section 6252 (g). In keeping with the provisions of the California Public Records Act, "writing" includes any preliminary drafts, notes or interagency or intra-agency memoranda" unless such draft items are "not retained…in the ordinary course of business" and "the public interest in withholding clearly outweighs the public interest in disclosure."

Additionally, certain common terms should be given broad interpretation. For example, "relating to" means, in addition to the usual and customary meaning, depict or depicting discuss or discussing, refer to or referring, reflect or reflecting, support or supporting, refute or refuting, address or addressing, evidence or evidencing, or record or recording.

For the purposes of this letter, a reference to an entity or body, such as the City's office includes any and all representatives of the entity or body.

**THE CITY'S RESPONSE TO**
**OUR REQUESTS ARE DUE WITHIN TEN DAYS**

In accordance with Section 6253 (c), please contact me within ten (10) days of your receipt of this request and notify me whether this request seeks copies of dis-closable public records in the City's possession, and, if not, the reasons for such determination.

Thank you in advance for your courtesy and cooperation in this matter.

Very truly yours,

//s//

Craig P. Alexander

# Exhibit “B”

**Request Closed** **Hide** Public

As of this date, our office has determined that the Office of the City Clerk is not in possession of any documents or information relating to your request. Please be advised that this response does not include any records that may be in the custody of other City departments. **Each department in the City of Los Angeles maintains and is responsible for their own records.** This request with the Office of the City Clerk is considered closed.

For all other city department's records please go to their respective webpage and contact them directly or please contact 311 Call Center at 213-473-3231.
--
Please contact the Mayor's Office at (213) 978-1028 or visit his website at http://mayor.lacity.org for the records you are seeking.
*June 4, 2020, 8:08am*

**Document(s) Released to Requester** Public

Law Offices of Craig P. Alexander - Shelter in Place, Face Covering, Cancel Mass & Other Covid-19 Orders 06 03 20.pdf
*June 4, 2020, 8:07am*

**Department Assignment** Public
City Clerk
*June 4, 2020, 8:07am*

**Request Opened** Public
Request received via web
*June 4, 2020, 8:07am*

# EXHIBIT “C”

# *Law Offices of Craig P. Alexander*

*24681 La Plaza, Suite 250*
*Dana Point, CA 92629*
*Office: 949-481-6400 Facsimile: 949-242-2545*
*E-mail: craig@craigalexanderlaw.com*


**VIA ELECTRONIC (EMDCOMMUNICATIONS@LACITY.ORG) AND U.S. MAIL**

June 4, 2020

City of Los Angeles
Emergency Management Department
200 N. Spring Street, Room 1533
Los Angeles, CA 90012
Atten: Public Records Act Requests

RE: California Public Records Act Request in re Corona Virus Pandemic / COVID-19 – Public Health orders regarding "Shelter in Place", "Face Covering", "Cancel Mass Gathering" and any other COVID-19 orders.

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Pursuant to the California Public Records Act, Govt. Code §§ 6250-6276.48, Center for American Liberty ("Requestor") respectfully requests to inspect all public records in the possession or control of the City of Los Angeles (including the Emergency Management Department) ("City") office for the following::

1. Each set of data (including but not limited to scientific studies, peer reviews, medical studies, analysis, hospital data, public health studies, health care statistics, memorandum, letters, correspondence, directives, etc.) upon which the City (including the Emergency Management Department) based its decision to issue any and all "Shelter in Place", "Face Covering", "Cancel Mass Gathering" and any other COVID-19 orders / recommendations from October 1, 2019 to the present date regarding the COVID-19 pandemic, including but not limited to the City's orders and recommendations dated March 4, March 12, March 15, March 17, March 21, March 24, March 25, March 30, March 31, April 7, April 10, April

17, April 24, April 22, April 27, May 4, May 7, May 19 and June 1, 2020 any prior or subsequent orders (as set forth on https://www.lamayor.org/COVID19Orders);
2. Each correspondence, including electronic communication and in paper format, regarding each renewal or modification of any Order; and
3. A copy of any and all requests for similar records under the California Public Records Act received by the City.

These requests are for any and all writings and communications (including but not limited to, letters, electronic communications, e-mails, text messages, notes, memorandums, messages) whether or not those communications are stored in the City's files and/or servers or on personal devices / accounts such as private electronic mail accounts or cellular telephones. *City of San Jose v. Superior Court (Smith)* (2017) 2 Cal. 5th 608.

The time frame for these Requests are October 1st, 2019 and the date of this letter (June 4, 2020).

**PUBLIC RECORDS ACT REQUEST NO. II**
**FOR DOCUMENTS RELATED TO THE CITY'S**
**FINDINGS OF ITS ALLOWED "DIRECT" COSTS PER GOVERNMENT**
**CODE SECTION 6253 (B).**

Since the Public Records Request Act allows the City to only charge its "direct" costs for photocopying, please disclose how (including backup costs information or studies **not** just the City's formal policy on photocopy / duplication charges) the City arrives at its "direct" cost per page for photocopying charges. Please consider this request to be a separate Public Records Act Request.

**REQUEST FOR INFORMATION IN ELECTRONIC FORMAT PURSUANT TO**
**GOVERNMENT CODE SECTION 6253.9 (A) (2) & (E).**

My client is seeking these records in any and all electronic formats your office keeps them in. Under the Public Records Act, the City's office is required to deliver the information in whatever electronic format it is in no matter whether it is Excel, Word, WordPerfect or some other program or programs. Government Code section 6253.9 (a) (2) & (e). **My client's request extends to receipt of this information in the electronic format your office maintains these records in.** Delivery of this information to me by electronic mail (craig@craigalexanderlaw.com) or via a thumb drive or via a disk is fine. I can supply the City with a thumb drive if needed. *Please advise what electronic format these records are kept in.*

In addition, if there are documents that satisfy this request that are in **both** electronic and paper formats, my client offers to receive the electronic version of those records and forgo inspection and potential photocopying of those paper copies. It is hoped that this will save the City and my client's time, trouble and expense.

If you anticipate that data compilation, extraction, or programming will be required to satisfy a request (per Section 6253.9(b)), please provide a written estimate and justification for same. Given the high profile of this matter with the public and the recentness of the date of any responsive records (October 1, 2019 to June 4, 2020), a compilation, extraction or programming should not be required to obtain responsive documents. In addition on May 28, 2020 the California Supreme Court ruled that an agency may not charge a requestor of responsive documents for the act of searching for those documents or for review and redaction of any portion of a responsive document where the agency is claiming it is subject to an exemption or privilege. *National Lawyers Guild v. City of Hayward, et al* (2020) 2020 WL 2761057 (Case No. S252445) _____ Cal. 5th _____.

**REQUEST FOR INSPECTION OF DOCUMENTS**

For any records not delivered electronically, once my client's agent and/or I have had an opportunity to inspect these records, we will designate which documents we will wish to obtain copies from your office and its agents, employees, consultants, etc. If a document exists in both electronic and paper formats, my client selects to receive a copy of the electronic version of the document. This should save both your office time and funds in duplication time and costs and my client duplication costs.

The California Public Records Act requires the City's office to "reveal the general nature of the documents withheld," and to "set forth the names and titles or positions of each person responsible for the denial." Cal. Govt. Code Section 6253 (d). I emphasize my client's request for a specific response and all applicable exemptions to the request. A blanket list of exemptions that may or may not apply to the request coupled with a failure to indicate the existence of documents responsive to the request denies us the ability to evaluate whether the City has justifiably withheld responsive documents. Denying my client this opportunity frustrates the Legislature's primary purpose in enacting the California Public Records Act, which is to "maximize public access to agency records."

We agree that after our inspection of documents made available, to pay the direct cost of duplicating any and all responsive writings we request to have copied in accordance with Section 6253(b). However we will not pay for any charges related to searching, reviewing or redacting documents or portions thereof. Cal. Govt. Code Section 6253(b).

There is no question that your office is a public entity subject to the Public Records Act pursuant to Government Code section 6252 and it must comply with the Request as set forth under the Act.

Terms utilized that are defined by the California Public Records Act should be given their full meaning. Thus, for example, a request for any "writing" includes a request for "any handwriting, typewriting, printing, Photostatting, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words,

pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored. Cal. Govt Code section 6252 (g). In keeping with the provisions of the California Public Records Act, "writing" includes any preliminary drafts, notes or interagency or intra-agency memoranda" unless such draft items are "not retained…in the ordinary course of business" and "the public interest in withholding clearly outweighs the public interest in disclosure."

Additionally, certain common terms should be given broad interpretation. For example, "relating to" means, in addition to the usual and customary meaning, depict or depicting discuss or discussing, refer to or referring, reflect or reflecting, support or supporting, refute or refuting, address or addressing, evidence or evidencing, or record or recording.

For the purposes of this letter, a reference to an entity or body, such as the City's office includes any and all representatives of the entity or body.

**THE CITY'S RESPONSE TO**
**OUR REQUESTS ARE DUE WITHIN TEN DAYS**

In accordance with Section 6253 (c), please contact me within ten (10) days of your receipt of this request and notify me whether this request seeks copies of dis-closable public records in the City's possession, and, if not, the reasons for such determination.

Thank you in advance for your courtesy and cooperation in this matter.

Very truly yours,

//s//

Craig P. Alexander

# EXHIBIT “D”

**From:** Jessica Kellogg
**To:** Craig Alexander
**Subject:** Re: California Public Records Act Requests
**Date:** Thursday, June 4, 2020 3:38:54 PM

---

Hello Craig,

EMD has received the following CPRA request relating to the shelter in place, face covering, mass gathering and other COVID-19 related directives. Seeing that Mayor Garcetti issues these directives, this request should be directed to the Office of Mayor Eric Garcetti, please forward this request to skyler.gray@lacity.org.

Thank you,


photo

**Jessica Kellogg, MPP**
Public Information Officer
Emergency Management Department
Phone: (213) 484-4896
Website: ReadyLA.org


On Thu, Jun 4, 2020 at 11:28 AM Craig Alexander <craig@craigalexanderlaw.com> wrote:

> Dear Office of Emergency Management Department,
>
> Please see my client's Public Records Act requests.
>
> Thank you in advance for your courtesy and cooperation in this matter,
>
> Craig Alexander
>
> 949-481-6400 office
>
> 949-636-1003 cell
>
> **Confidentiality Note: Please note that the information in this email is confidential and may be privileged and is intended only for the use of the named addressee(s). If you have received this information in error, please notify us immediately by reply email, at craig@craigalexanderlaw.com, or by calling (949) 481-6400. Please destroy this transmission, all attachments to it, and any copies that have been made.**

# EXHIBIT “E”

ERIC GARCETTI
MAYOR

June 15, 2020

VIA E-MAIL: (craig@craigalexanderlaw.com)

Craig P. Alexander
Law Offices of Craig P. Alexander
24681 La Plaza, Suite 250
Dana Point, CA 92629

***Re: California Public Records Act Request***

Dear Mr. Alexander,

This letter responds to your June 3, 2020 California Public Records Act ("CPRA") request to the Office of the Mayor of Los Angeles ("Office") seeking certain records related to "[e]ach set of data . . . upon which the City . . . based its decision to issue any and all . . . COVID-19 orders / recommendations" ("Request").

The Office has determined, in part, that your Request seeks copies of disclosable public records that are in its possession. Pursuant to Government Code § 6253, we estimate that we will provide non-exempt records responsive to your Request by Wednesday, July 15, 2020. You will be notified in writing of any revisions to this estimate.

Please be advised that this Office will decline to produce any records that fall into any of the following, well-established exemptions to the CPRA: (i) records that are subject to attorney-client privilege and/or attorney work product doctrine; (ii) records whose disclosure would constitute an unwanted invasion of personal privacy, and may be withheld under Government Code §§ 6254(c), 6254.3, and/or 6254.20; (iii) records that constitute "personnel…or similar files," and may be withheld pursuant to Government Code § 6254(c); (iv) records pertaining to pending litigation in which the City of Los Angeles is a party; (v) records that are pre-decisional and advisory in nature and may be withheld pursuant to the deliberative process privilege pursuant to Government Code § 6255; and (vi) records for which the public interest served by withholding the records clearly outweighs the public interest served by disclosure, and may be withheld pursuant to Government Code § 6255.

Sincerely,
/s/
SKYLER GRAY
Deputy Legal Counsel
Mayor Eric Garcetti

# EXHIBIT “F”

ERIC GARCETTI
MAYOR

July 15, 2020

VIA E-MAIL: (craig@craigalexanderlaw.com)

Craig P. Alexander
Law Offices of Craig P. Alexander
24681 La Plaza, Suite 250
Dana Point, CA 92629

***Re: California Public Records Act Request***

Dear Mr. Alexander,

This letter responds to your June 3, 2020 California Public Records Act ("CPRA") request to the Office of the Mayor of Los Angeles ("Office") and the City of Los Angeles Emergency Management Department ("EMD") seeking certain records related to "[e]ach set of data . . . upon which the City . . . based its decision to issue any and all . . . COVID-19 orders / recommendations" ("Request").

Enclosed, please find records responsive to your Request.

Please be advised that this Office and EMD declined to produce any records that fall into any of the following, well-established exemptions to the CPRA: (i) records that are subject to attorney-client privilege and/or attorney work product doctrine; (ii) records whose disclosure would constitute an unwanted invasion of personal privacy, and may be withheld under Government Code §§ 6254(c), 6254.3, and/or 6254.20; (iii) records that are pre-decisional and advisory in nature and may be withheld pursuant to the deliberative process privilege pursuant to Government Code § 6255; and (iv) records for which the public interest served by withholding the records clearly outweighs the public interest served by disclosure, and may be withheld pursuant to Government Code § 6255.

Sincerely,
/s/
SKYLER GRAY
Deputy Legal Counsel
Mayor Eric Garcetti

# EXHIBIT “G”

| INSTAGRAM | | |
|---|---|---|
| Date | Post \| V = Video | Link |
| 2/27/20 | Novel Coronavirus | https://www.instagram.com/p/B9FqahUI5Os/ |
| 2/29/20 | Get the Facts #7 | https://www.instagram.com/p/B9KPCeuAJSB/ |
| 2/29/20 | Get the Facts #6 | https://www.instagram.com/p/B9KPtkRALPV/ |
| 3/1/20 | Get the Facts #8 | https://www.instagram.com/p/B9Mpz4IApKu/ |
| 3/1/20 | (V) How can I protect myself? | https://www.instagram.com/p/B9Mp987gjl2/ |
| 3/1/20 | (V) 5 Things to Know | https://www.instagram.com/p/B9Mrgfsgu88/ |
| 3/2/20 | (V) Coronavirus Disease 2019 | https://www.instagram.com/p/B9QCveYAVAM/ |
| 3/2/20 | Get the Facts #9 | https://www.instagram.com/p/B9QDlIHgrrA/ |
| 3/3/20 | Get the Facts #10 | https://www.instagram.com/p/B9R5aEigSY-/ |
| 3/3/20 | Get the Facts #11 | https://www.instagram.com/p/B9R6U6FAyeV/ |
| 3/4/20 | (V) Mayor signed Declaration of Local Emergency | https://www.instagram.com/p/B9VLyAwAsWr/ |
| 3/4/20 | Mayor signed Declaration of Local Emergency | https://www.instagram.com/p/B9VMA4XAcif/ |
| 3/4/20 | (V) Mayor signed Declaration of Local Emergency - En Espagnol | https://www.instagram.com/p/B9VMFRWga64/ |
| 3/5/20 | Get the Facts #12 | https://www.instagram.com/p/B9XJnF5AAv8/ |
| 3/5/20 | Get the Facts #13 | https://www.instagram.com/p/B9XKKK3Atqw/ |
| 3/5/20 | Get the Facts #14 | https://www.instagram.com/p/B9XKvjuA-ga/ |
| 3/6/20 | Stay Informed | https://www.instagram.com/p/B9aVIWSlUXH/ |
| 3/6/20 | (V) What you need to know. | https://www.instagram.com/p/B9aWj3zgjbI/ |
| 3/7/20 | Take Precautions | https://www.instagram.com/p/B9cABFzlcz5/ |
| 3/8/20 | For the latest information... | https://www.instagram.com/p/B9eTvzQj2vq/ |
| 3/9/20 | What you should know... | https://www.instagram.com/p/B9g_d4FjCQX/ |
| 3/10/20 | The City will be sharing updates and info. | https://www.instagram.com/p/B9jkU69navc/ |
| 3/11/20 | Plan Ahead | https://www.instagram.com/p/B9mVenVHdab/ |
| 3/11/20 | USC Homeless Crisis Interview | https://www.instagram.com/p/B9mq0S_AHkD/ |
| 3/12/20 | Advice For People Over 65 | https://www.instagram.com/p/B9oxJ0ZHvYs/ |
| 3/13/20 | Sign Up For Notify LA | https://www.instagram.com/p/B9rV9gXF9lH/ |
| 3/14/20 | Stay Informed | https://www.instagram.com/p/B9t6t7mAAY4/ |
| 3/15/20 | City Departments are reviewing operational plans. | https://www.instagram.com/p/B9wfgpIHkBa/ |
| 3/16/20 | The Port of LA is on hightened alert | https://www.instagram.com/p/B9zEVFHAZH9/ |
| 3/16/20 | Closed to the Public until 3/31 | https://www.instagram.com/p/B9zNxKAAeAb/ |
| 3/18/20 | LA City installing sanitzing stations | https://www.instagram.com/p/B94iv2fA7GB/ |
| 3/18/20 | High Touch Surface Safety | https://www.instagram.com/p/B94jtEfAXAH/ |
| 3/18/20 | Emergency Loans to Small Businesses | https://www.instagram.com/p/B94kXeygYbm/ |
| 3/19/20 | (V) Advice from Sonia Y. Angell - Publich Health Director | https://www.instagram.com/p/B97riNiApod/ |
| 3/21/20 | LA County Residents safer at home | https://www.instagram.com/p/B-AZcBKAsuB/ |
| 3/21/20 | Safer at home order in effect until 4/19/20 | https://www.instagram.com/p/B-AbJ9RAKaO/ |
| 3/22/20 | USNS bringing medical care to Port of LA | https://www.instagram.com/p/B-ED43-gNAI/ |
| 3/22/20 | (V) EMD's response to COVID | https://www.instagram.com/p/B-ENDcYgHM7/ |

| | | |
|---|---|---|
| 3/22/20 | Closing sports, recreation and parking at beaches. | https://www.instagram.com/p/B-ENr-nAqL6/ |
| 3/26/20 | (V) LADWP moratorium on water and power shut offs extended. | https://www.instagram.com/p/B-M4jtWgOBg/ |
| 3/26/20 | (V) Assuring residents that food supply lines are healthy | https://www.instagram.com/p/B-M5gxVAJRj/ |
| 3/27/20 | Info on COVID testing | https://www.instagram.com/p/B-Q_BcGgfoA/ |
| 3/28/20 | Homebodies save lives! | https://www.instagram.com/p/B-S58gBA-4-/ |
| 3/28/20 | Home Quarantine | https://www.instagram.com/p/B-S7FHlgJ_T/ |
| 3/28/20 | Info on COVID testing - En Espagnol | https://www.instagram.com/p/B-S7UsCAbuU/ |
| 3/30/20 | COVID Businss Ambassador Program | https://www.instagram.com/p/B-XaofHgAq-/ |
| 3/30/20 | Call this # if you are feeling stressed or depressed | https://www.instagram.com/p/B-XdxE7AICV/ |
| 4/1/20 | Rent Due? - En Espagnol | https://www.instagram.com/p/B-c3uS9Acyy/ |
| 4/1/20 | Rent Due? | https://www.instagram.com/p/B-c3uQ8ASKa/ |
| 4/2/20 | Angelenos should wear non-medical face masks in public | https://www.instagram.com/p/B-fTD1UAaaS/ |
| 4/6/20 | Non-medical face mask examples | https://www.instagram.com/p/B-pUfbpAHM6/ |
| 4/6/20 | Check in with friends and family members | https://www.instagram.com/p/B-pWTwFAGRo/ |
| 4/6/20 | New billboards aroung LA | https://www.instagram.com/p/B-p5Bl3gl6r/ |
| 4/6/20 | Food Security | https://www.instagram.com/p/B-qDaH4jDq4/ |
| 4/7/20 | Donation Management | https://www.instagram.com/p/B-rxWv-g16r/ |
| 4/7/20 | COVID Testing | https://www.instagram.com/p/B-sFFNyDIum/ |
| 4/7/20 | EOC Repost | https://www.instagram.com/p/B-sFfhhgqIO/ |
| 4/7/20 | Wearng a face covering in public can protect others | https://www.instagram.com/p/B-sGESTAXEg/ |
| 4/7/20 | COVID Testing - En Espagnol | https://www.instagram.com/p/B-sGVZngaKh/ |
| 4/7/20 | (V) COVID Testing - What to expect | https://www.instagram.com/p/B-syEjqAbH6/ |
| 4/8/20 | Help for small buisnesses | https://www.instagram.com/p/B-uWP1yF6ik/ |
| 4/8/20 | Everyone required to wear a mask | https://www.instagram.com/p/B-ulASjARIk/ |
| 4/8/20 | (V) CORE visits the EOC | https://www.instagram.com/p/B-vH5GZAe45/ |
| 4/8/20 | CORE - Stay informed | https://www.instagram.com/p/B-vJG3UACmu/ |
| 4/8/20 | Sean Penn and CORE visit EOC | https://www.instagram.com/p/B-vJQ1pAQbv/ |
| 4/9/20 | Partnership with Verizon for LAUSD | https://www.instagram.com/p/B-w7DL5H_Ix/ |
| 4/10/20 | Lighting City Hall in support of healthcare workers | https://www.instagram.com/p/B-zz6AMgxa6/ |
| 4/10/20 | Interpersonal Violence | https://www.instagram.com/p/B-z7bknndgM/ |
| 4/13/20 | Worker protection order for essential businesses | https://www.instagram.com/p/B-8S2Akj6KV/ |
| 4/13/20 | (V) EMD General Manger talks Economic Recovery | https://www.instagram.com/p/B-8ZF4VgFoR/ |
| 4/13/20 | Safer at home extended to 5/15/20 | https://www.instagram.com/p/B-8ZhzUF4y6/ |
| 4/14/20 | findhelp.org | https://www.instagram.com/p/B-9y-WdlxuC/ |
| 4/14/20 | COVID Daily Data Summary | https://www.instagram.com/p/B--96wFAWfZ/ |
| 4/14/20 | Angeleno Card for financial assistance | https://www.instagram.com/p/B---OGlgPkw/ |
| 4/14/20 | (V) iSwimLA instructional video | https://www.instagram.com/p/B--_CdlAZQE/ |
| 4/15/20 | Food resouces for vulnerable and seniors | https://www.instagram.com/p/B_AXzi5l9Gv/ |
| 4/15/20 | (V) Learn how to protect your those who are vulnerable | https://www.instagram.com/p/B_Axb_Zg68U/ |
| 4/15/20 | Worker protection order for essential businesses - En Espagnol | https://www.instagram.com/p/B_AyJgXgpjd/ |

| | | |
|---|---|---|
| 4/15/20 | (V) Rent payments, evictions and more | https://www.instagram.com/p/B_A4K6IJTnp/ |
| 4/16/20 | For those who require assistance | https://www.instagram.com/p/B_C8kfoFjyw/ |
| 4/17/20 | Medication delivery using smart phone | https://www.instagram.com/p/B_FhZyGjyyf/ |
| 4/18/20 | Medication delivery using smart phone apps | https://www.instagram.com/p/B_IGGFEg1xe/ |
| 4/20/20 | (V) State of the City Address 2020 | https://www.instagram.com/p/B_NqtxtgfAB/ |
| 4/20/20 | We will be stronger | https://www.instagram.com/p/B_NsKligLCk/ |
| 4/20/20 | Key elements of our return | https://www.instagram.com/p/B_NslR1ARgT/ |
| 4/22/20 | Call 3-1-1 for assistance | https://www.instagram.com/p/B_S6SiNgWM-/ |
| 4/23/20 | Check on your neighbors - RYLAN | https://www.instagram.com/p/B_VfJvZgmFS/ |
| 4/24/20 | McDonald's donation to EOC | https://www.instagram.com/p/B_XqxENgPBR/ |
| 4/28/20 | Properly dispose of PPE | https://www.instagram.com/p/B_h4rcoAPhp/ |
| 4/29/20 | Free COVID testing to ALL residents | https://www.instagram.com/p/B_ljaUpAmqS/ |
| 5/5/20 | Thank you to park rangers for assisting with COVID testing | https://www.instagram.com/p/B_0jG4hgWKH/ |
| 5/5/20 | Thank you to BAPS Charites for donating supplies | https://www.instagram.com/p/B_0oLGoAmPh/ |
| 5/6/20 | Road to Recovery | https://www.instagram.com/p/B_2qgm_I3b9/ |
| 5/6/20 | Thank you to Super Coffee for donating | https://www.instagram.com/p/B_2v1nBF5QH/ |
| 5/6/20 | Thank you to Ring for donating masks | https://www.instagram.com/p/B_24R7sHmdw/ |
| 5/6/20 | LAUSD will be starting August 18, 2020 | https://www.instagram.com/p/B_3BMo6HsRo/ |
| 5/7/20 | LA providing legal assistance due to COVID | https://www.instagram.com/p/B_5KOLFASIe/ |
| 5/7/20 | LA providing legal assistance due to COVID - En Espagnol | https://www.instagram.com/p/B_5KU2Ig5yK/ |
| 5/7/20 | (V) LAFD addressing EOC focus during COVID | https://www.instagram.com/p/B_5a6SJgTE1/ |
| 5/7/20 | Thank you to CORE for donating masks & assisting with testing | https://www.instagram.com/p/B_5k4xigU0a/ |
| 5/8/20 | Golf courses and public trails REOPEN | https://www.instagram.com/p/B_8X-veAhfP/ |
| 5/8/20 | Face coverings required at LAX | https://www.instagram.com/p/B_8Z-jqAjG-/ |
| 5/8/20 | Domestic violence during quarantine assistance | https://www.instagram.com/p/B_8c_SugSzD/ |
| 5/11/20 | Price gouging | https://www.instagram.com/p/CADr8xCI-mw/ |
| 5/11/20 | What renters should know during COVID | https://www.instagram.com/p/CADzKR7BYdq/ |
| 5/11/20 | Support local community recovery | https://www.instagram.com/p/CAEHvwtnv-W/ |
| 5/12/20 | Coping with grief during COVID | https://www.instagram.com/p/CAGZ5EpAQ5i/ |
| 5/12/20 | Stay up to date on City operations during COVID | https://www.instagram.com/p/CAGcqSFg_27/ |
| 5/12/20 | FREE hot lunches from DOD | https://www.instagram.com/p/CAGjihSH5qu/ |
| 5/12/20 | Rules for beaches reopening | https://www.instagram.com/p/CAGpSxaB2HR/ |
| 5/14/20 | Workers comp for workers who contract COVID while working | https://www.instagram.com/p/CALbRS3lHrk/ |
| 5/14/20 | All Angelenos required to wear a mask | https://www.instagram.com/p/CALcMJDAtaA/ |
| 5/14/20 | All Angelenos required to wear a mask - En Espagnol | https://www.instagram.com/p/CALcnHDAUT7/ |
| 5/18/20 | How to hike safely | https://www.instagram.com/p/CAVuIGgnz_8/ |
| 5/18/20 | How to hike safely - En Espagnol | https://www.instagram.com/p/CAVuMwOgDiM/ |
| 5/18/20 | Guidance for Angelenos in new reality | https://www.instagram.com/p/CAVurLkDXyS/ |
| 5/18/20 | Guidance for Angelenos in new reality - En Espagnol | https://www.instagram.com/p/CAVu4wADPIH/ |
| 5/18/20 | Buisness owner info sring COVID | https://www.instagram.com/p/CAV4QWWgC2Z/ |

| | | |
|---|---|---|
| 5/18/20 | COVID roadmap to recovery | https://www.instagram.com/p/CAV7lHQp8gj/ |
| 5/18/20 | Proper face covering | https://www.instagram.com/p/CAV_FtnnDd4/ |
| 5/18/20 | Picking up takeout food | https://www.instagram.com/p/CAWCckUAtPR/ |
| 5/18/20 | Underlying health condition lead to higher risk of COVID | https://www.instagram.com/p/CAWF9ZuoNnR/ |
| 5/18/20 | Free emergency meals for seniors | https://www.instagram.com/p/CAWGcYXFB4g/ |
| 5/18/20 | (V) Social Distancing | https://www.instagram.com/p/CAWM0MnFktm/ |
| 5/20/20 | Councilmember Curren Price reminder of free testing | https://www.instagram.com/p/CAbFLj8HmTs/ |
| 5/20/20 | COVID resource list | https://www.instagram.com/p/CAbN0IQnBzO/ |
| 5/20/20 | Waiting on test results? Check spam folder | https://www.instagram.com/p/CAbVwy3Movn/ |
| 5/22/20 | Message from Mayor about staying safe | https://www.instagram.com/p/CAgEKo4gJ2l/ |
| 5/26/20 | Free COVID testing | https://www.instagram.com/p/CAqRVJaJoA8/ |
| 5/26/20 | Free COVID testing - En Espagnol | https://www.instagram.com/p/CAqRVJaJoA8/ |
| 5/27/20 | News regarding LA County reopening | https://www.instagram.com/p/CAsvSGbFmfl/ |
| 5/28/20 | What is OPEN & CLOSED - Recreation | https://www.instagram.com/p/CAvH8-1g3q0/ |
| 5/28/20 | What is OPEN & CLOSED - Businesses | https://www.instagram.com/p/CAvIAAHgD-M/ |
| 5/28/20 | Healthcare businesses are OPEN | https://www.instagram.com/p/CAvIDO8A-QV/ |
| 5/28/20 | (V) Mayor announces retail stores can reopen | https://www.instagram.com/p/CAvWJbngz_2/ |
| 5/28/20 | LA Renters Relief Program | https://www.instagram.com/p/CAvn-cTDZPZ/ |
| 5/28/20 | Safer LA - Retail update | https://www.instagram.com/p/CAvqc7qlaor/ |
| 5/28/20 | Safer LA - House of worship update | https://www.instagram.com/p/CAvtAxjplpl/ |
| 5/28/20 | Cal HOPE and Red Cross help line | https://www.instagram.com/p/CAvvCwYltaJ/ |
| 5/29/20 | Proper disposal of PPE | https://www.instagram.com/p/CAxxr0AnmxF/ |
| 5/30/20 | Tips for Stayng Healthy and Safe - Informagente interview | https://www.instagram.com/p/CA0dNoZA1c6/ |
| 6/5/20 | What to do after extended exposure at public gatherings | https://www.instagram.com/p/CBCJDg1ALh8/ |
| 6/8/20 | Support if you lost a loved one during COVID | https://www.instagram.com/p/CBLkwsaF8Uv/ |
| 6/10/20 | Phase 3 of reopening beginning | https://www.instagram.com/p/CBQ_zQige3d/ |
| 6/15/20 | Avoid gathering in groups | https://www.instagram.com/p/CBdgz6klnRD/ |
| 6/15/20 | Free testing available | https://www.instagram.com/p/CBdwGc7Hlz6/ |
| 6/15/20 | Symptoms of COVID | https://www.instagram.com/p/CBd901lBWGH/ |
| 6/15/20 | Stress during COVID | https://www.instagram.com/p/CBeEsfpHrqK/ |
| 6/16/20 | Take these steps to prevent COVID | https://www.instagram.com/p/CBf9g-Kgy59/ |
| 6/16/20 | Support local businesses during COVID | https://www.instagram.com/p/CBgEbw_AlKk/ |
| 6/16/20 | SBA offering EIDL to those impacted by COVID | https://www.instagram.com/p/CBgSukvHNNz/ |

| Twitter | | | | |
|---|---|---|---|---|
| Date | Post \| V = Video | Link | | |
| 2/27/20 | Novel Coronavirus | https://twitter.com/ReadyLA/status/123316836793616 | | |
| 2/28/20 | Coordingating with LAPH for updates | https://twitter.com/ReadyLA/status/123356409327935 | | |
| 3/5/20 | LATW tips on preventing COVID | https://twitter.com/ReadyLA/status/123572412014842 | | |
| 3/6/20 | Stay Informed | https://twitter.com/ReadyLA/status/123607515735090 | | |
| 3/7/20 | (V) What you need to know. | https://twitter.com/ReadyLA/status/123639232551900 | | |
| 3/7/20 | Take Precautions | https://twitter.com/ReadyLA/status/123631324764250 | | |
| 3/8/20 | For the latest information... | https://twitter.com/ReadyLA/status/123677383728452 | | |
| 3/8/20 | For the latest information... - En Espagnol | https://twitter.com/ReadyLA/status/123677383764934 | | |
| 3/10/20 | The City will be sharing updates and info. | https://twitter.com/ReadyLA/status/123738025783079 | | |
| 3/11/20 | Plan Ahead | https://twitter.com/ReadyLA/status/123776777920339 | | |
| 3/11/20 | AARP on high health-risk and COVID | https://twitter.com/ReadyLA/status/123777190957759 | | |
| 3/12/20 | Advice For People Over 65 | https://twitter.com/ReadyLA/status/123811013831108 | | |
| 3/12/20 | Sign Up For Notify LA | https://twitter.com/ReadyLA/status/123826707510303 | | |
| 3/13/20 | Sign Up For Notify LA | https://twitter.com/ReadyLA/status/123847256678164 | | |
| 3/14/20 | Stay Informed | https://twitter.com/ReadyLA/status/123883490464698 | | |
| 3/15/20 | City Departments are reviewing operational plans. | https://twitter.com/ReadyLA/status/123919728017718 | | |
| 3/16/20 | The Port of LA is on hightened alert | https://twitter.com/ReadyLA/status/123955970956640 | | |
| 3/22/20 | PSA Ensuring deparments coordinate | https://twitter.com/ReadyLA/status/124196390681528 | | |
| 3/31/20 | Streets LA COVID Response | https://twitter.com/ReadyLA/status/124514198050775 | | |
| 4/2/20 | Angelenos should wear non-medical face masks in public | https://twitter.com/ReadyLA/status/124578485070494 | | |
| 4/2/20 | (V) GM LIVE - Coordination efforts to and our mitigation plan | https://twitter.com/ReadyLA/status/124581126591141 | | |
| 4/6/20 | (V) GM LIVE - Share EOC plans to fight COVID | https://twitter.com/ReadyLA/status/124720909994878 | | |
| 4/6/20 | How to handle stress during COVID | https://twitter.com/ReadyLA/status/124724900324009 | | |
| 4/6/20 | Food Security | https://twitter.com/ReadyLA/status/124729810359143 | | |
| 4/7/20 | Donation Management | https://twitter.com/ReadyLA/status/124753984930269 | | |
| 4/7/20 | COVID Testing | https://twitter.com/ReadyLA/status/124757815896405 | | |
| 4/7/20 | COVID Testing - En Espagnol | https://twitter.com/ReadyLA/status/124757869843970 | | |
| 4/8/20 | Help for small buisnesses | https://twitter.com/ReadyLA/status/124790235500722 | | |
| 4/8/20 | Sean Penn and CORE visit EOC | https://twitter.com/ReadyLA/status/124807418566803 | | |
| 4/9/20 | Partnership with Verizon for LAUSD | https://twitter.com/ReadyLA/status/124826486476364 | | |
| 4/9/20 | GM LIVE - Resource aquisition | https://twitter.com/ReadyLA/status/124835926235235 | | |
| 4/13/20 | Worker protection order for essential businesses | https://twitter.com/ReadyLA/status/124986576926719 | | |
| 4/14/20 | findhelp.org | https://twitter.com/ReadyLA/status/125007658485126 | | |
| 4/15/20 | Food resouces for vulnerable and seniors | https://twitter.com/ReadyLA/status/125043905416582 | | |
| 4/15/20 | Information for older adults during COVID | https://twitter.com/ReadyLA/status/125048269041279 | | |
| 4/16/20 | For those who require assistance | https://twitter.com/ReadyLA/status/125080143100474 | | |
| 4/18/20 | Meal delivery using smart phone apps | https://twitter.com/ReadyLA/status/125152625733187 | | |
| 4/22/20 | Faith based organizations making a difference during COVID | https://twitter.com/ReadyLA/status/125301650456974 | | |

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| 4/23/20 | Check on your neighbors - RYLAN | https://twitter.com/ReadyLA/status/125341057691240 |
| 4/27/20 | COVID Burnout | https://twitter.com/ReadyLA/status/125481904119932 |
| 4/27/20 | (V) LA City Staff and EOC share how they are helping during COVID | https://twitter.com/ReadyLA/status/125490146767829 |
| 4/28/20 | Battling fatigue during lockdown | https://twitter.com/ReadyLA/status/125520959806927 |
| 4/30/20 | Mental health during COVID | https://twitter.com/ReadyLA/status/125601845904277 |
| 5/5/20 | Thank you to park rangers for assisting with COVID testing | https://twitter.com/ReadyLA/status/125778270594249 |
| 5/5/20 | Thank you to BAPS Charites for donating supplies | https://twitter.com/ReadyLA/status/125779358214184 |
| 5/6/20 | Road to Recovery | https://twitter.com/ReadyLA/status/125808030582041 |
| 5/6/20 | Thank you to Super Coffee for donating | https://twitter.com/ReadyLA/status/125809218626615 |
| 5/6/20 | Thank you to Ring for donating masks | https://twitter.com/ReadyLA/status/125811060020869 |
| 5/6/20 | LAUSD will be starting August 18, 2020 | https://twitter.com/ReadyLA/status/125813010204035 |
| 5/7/20 | Thank you to CORE for donating masks & assisting with testing | https://twitter.com/ReadyLA/status/125849006014567 |
| 5/11/20 | Price gouging | https://twitter.com/ReadyLA/status/125991296165888 |
| 5/11/20 | What renters should know during COVID | https://twitter.com/ReadyLA/status/125992884628090 |
| 5/11/20 | Support local community recovery | https://twitter.com/ReadyLA/status/125997411847416 |
| 5/12/20 | Coping with grief during COVID | https://twitter.com/ReadyLA/status/126029546834668 |
| 5/12/20 | Stay up to date on City operations during COVID | https://twitter.com/ReadyLA/status/126030155849294 |
| 5/12/20 | FREE hot lunches from DOD | https://twitter.com/ReadyLA/status/126031668084622 |
| 5/12/20 | Rules for beaches reopening | https://twitter.com/ReadyLA/status/126032933313624 |
| 5/12/20 | Extending stay-at-home for three months | https://twitter.com/ReadyLA/status/126033423622713 |
| 5/13/20 | Mayor Garcetti's thoughts on extension | https://twitter.com/ReadyLA/status/126060013133157 |
| 5/13/20 | Beaches reopen | https://twitter.com/ReadyLA/status/126065197455641 |
| 5/13/20 | Project Roomkey | https://twitter.com/ReadyLA/status/126069139216003 |
| 5/13/20 | New Sectors that can reopen | https://twitter.com/ReadyLA/status/126063309399782 |
| 5/13/20 | Latest COVID stats and facts | https://twitter.com/ReadyLA/status/126063594456426 |
| 5/13/20 | Gov Newsom announces 1 milllion diagnostic tests for COVID | https://twitter.com/ReadyLA/status/126064097603876 |
| 5/13/20 | Western states urge federal support | https://twitter.com/ReadyLA/status/126064609303907 |
| 5/13/20 | Gov Newsom extends deadlines impacted by COVID | https://twitter.com/ReadyLA/status/126065608432005 |
| 5/13/20 | Gov Newsom insudtry guidance update | https://twitter.com/ReadyLA/status/126067117470873 |
| 5/13/20 | Loans available to agrcultural businesses | https://twitter.com/ReadyLA/status/126067628158842 |
| 5/13/20 | Guidance for resuming dental care | https://twitter.com/ReadyLA/status/126068124602535 |
| 5/13/20 | Info regarding Project Roomkey | https://twitter.com/ReadyLA/status/126068627567958 |
| 5/14/20 | Workers comp for workers who contract COVID while working | https://twitter.com/ReadyLA/status/126100218743563 |
| 5/14/20 | DMV expands virtual office | https://twitter.com/ReadyLA/status/126101092198977 |
| 5/18/20 | How to hike safely | https://twitter.com/ReadyLA/status/126245070943969 |
| 5/18/20 | How to hike safely - En Espagnol | https://twitter.com/ReadyLA/status/126245087553825 |
| 5/18/20 | Guidance for Angelenos in new reality | https://twitter.com/ReadyLA/status/126245543470061 |
| 5/18/20 | Guidance for Angelenos in new reality - En Espagnol | https://twitter.com/ReadyLA/status/126245544372678 |
| 5/18/20 | Buisness owner info sring COVID | https://twitter.com/ReadyLA/status/126247312225253 |
| 5/18/20 | Proper face covering | https://twitter.com/ReadyLA/status/126248820493612 |

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| 5/18/20 | Picking up takeout food | https://twitter.com/ReadyLA/status/126249574277575 |
| 5/18/20 | Underlying health condition lead to higher risk of COVID | https://twitter.com/ReadyLA/status/126250331022286 |
| 5/18/20 | Free emergency meals for seniors | https://twitter.com/ReadyLA/status/126250451896674 |
| 5/18/20 | (V) Social Distancing | https://twitter.com/ReadyLA/status/126251850347678 |
| 5/20/20 | Wearingface masks everywhere | https://twitter.com/ReadyLA/status/126315053037468 |
| 5/20/20 | (V) LIVE with CD8 about reentry into LA | https://twitter.com/ReadyLA/status/126318085509216 |
| 5/20/20 | Councilmember Curren Price reminder of free testing | https://twitter.com/ReadyLA/status/126320544940027 |
| 5/20/20 | COVID resource list | https://twitter.com/ReadyLA/status/126322439610325 |
| 5/20/20 | Waiting on test results? Check spam folder | https://twitter.com/ReadyLA/status/126324189215999 |
| 5/27/20 | News regarding LA County reopening | https://twitter.com/ReadyLA/status/126569222993233 |
| 5/28/20 | What is OPEN & CLOSED - Recreation | https://twitter.com/ReadyLA/status/126602746530394 |
| 5/28/20 | What is OPEN & CLOSED - Businesses | https://twitter.com/ReadyLA/status/126602870376450 |
| 5/28/20 | Healthcare businesses are OPEN | https://twitter.com/ReadyLA/status/126602902527886 |
| 5/28/20 | (V) Mayor announces retail stores can reopen | https://twitter.com/ReadyLA/status/126604835964039 |
| 5/28/20 | LA Renters Relief Program | https://twitter.com/ReadyLA/status/126609667351375 |
| 5/28/20 | Safer LA - Retail update | https://twitter.com/ReadyLA/status/126610211967065 |
| 5/28/20 | Safer LA - House of worship update | https://twitter.com/ReadyLA/status/126610774496638 |
| 5/28/20 | Cal HOPE and Red Cross help line | https://twitter.com/ReadyLA/status/126611210649308 |
| 5/29/20 | Proper disposal of PPE | https://twitter.com/ReadyLA/status/126639920540640 |
| 5/30/20 | Tips for Stayng Healthy and Safe - Informagente interview | https://twitter.com/ReadyLA/status/126677659990044 |
| 6/4/20 | COVID Update | https://twitter.com/ReadyLA/status/126861706383406 |
| 6/4/20 | Hot meals available every Friday | https://twitter.com/ReadyLA/status/126861706383406 |
| 6/5/20 | What to do after extended exposure at public gatherings | https://twitter.com/ReadyLA/status/126864919655643 |
| 6/5/20 | All COVID testing sites are open | https://twitter.com/ReadyLA/status/126897932196150 |
| 6/8/20 | Support if you lost a loved one during COVID | https://twitter.com/ReadyLA/status/127002856637837 |
| 6/10/20 | Phase 3 of reopening beginning | https://twitter.com/ReadyLA/status/127079302980531 |
| 6/11/20 | Safer LA reopening | https://twitter.com/LACity/status/1271220213967499 |
| 6/15/20 | Avoid gathering in groups | https://twitter.com/ReadyLA/status/127255491868828 |
| 6/15/20 | Free testing available | https://twitter.com/ReadyLA/status/127258848397516 |
| 6/15/20 | Updates on reopening | https://twitter.com/ReadyLA/status/127261284393068 |
| 6/15/20 | Updates on reopening - En Espagnol | https://twitter.com/ReadyLA/status/127261258757490 |
| 6/15/20 | Symptoms of COVID | https://twitter.com/ReadyLA/status/127261866054114 |
| 6/15/20 | Stress during COVID | https://twitter.com/ReadyLA/status/127263377649818 |
| 6/16/20 | Take these steps to prevent COVID | https://twitter.com/ReadyLA/status/127289955260187 |
| 6/16/20 | Support local businesses during COVID | https://twitter.com/ReadyLA/status/127291437580904 |
| 6/16/20 | SBA offering EIDL to those impacted by COVID | https://twitter.com/ReadyLA/status/127294680353778 |

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| 0704 |
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| 4768 |
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| 4192 |
| 8532 |
| 0384 |
| 4832 |

| Facebook | |
|---|---|
| Date | Post \| V = Video |
| 2/27/20 | Novel Coronavirus |
| 2/28/20 | Ready LA is coordinating with LA Public Health |
| 2/28/20 | Get the Facts #6 |
| 2/29/20 | Get the Facts #7 |
| 3/1/20 | Get the Facts #8 |
| 3/2/20 | CDC Test Kits |
| 3/2/20 | Get the Facts #9 |
| 3/3/20 | Get the Facts #10 |
| 3/3/20 | Get the Facts #11 |
| 3/4/20 | (V) Mayor signed Declaration of Local Emergency |
| 3/4/20 | Mayor signed Declaration of Local Emergency |
| 3/4/20 | Mayor signed Declaration of Local Emergency - En Espagnol |
| 3/5/20 | Get the Facts #12 |
| 3/5/20 | Get the Facts #13 |
| 3/5/20 | Get the Facts #14 |
| 3/6/20 | Stay Informed |
| 3/6/20 | (V) What you need to know. |
| 3/7/20 | Take Precautions |
| 3/8/20 | For the latest information... |
| 3/9/20 | What you should know... |
| 3/10/20 | The City will be sharing updates and info. |
| 3/11/20 | Plan Ahead |
| 3/11/20 | USC Homeless Crisis Interview |
| 3/12/20 | Advice For People Over 65 |
| 3/13/20 | Sign Up For Notify LA |
| 3/14/20 | Stay Informed |
| 3/15/20 | City Departments are reviewing operational plans. |
| 3/16/20 | The Port of LA is on hightened alert |
| 3/16/20 | Closed to the Public until 3/31 |
| 3/16/20 | Closed to the Public until 3/31 - En Espagnol |
| 3/17/20 | (V) Protect yourself against potential scammers |
| 3/18/20 | LA City installing sanitzing stations |
| 3/18/20 | High Touch Surface Safety |
| 3/18/20 | Emergency Loans to Small Businesses |
| 3/19/20 | Practice social distancing |
| 3/19/20 | (V) Advice from Sonia Y. Angell - Publich Health Director |
| 3/20/20 | LA County Residents safer at home |
| 3/20/20 | LA County Residents safer at home - En Espagnol |
| 3/20/20 | (V) Dr. Barbara Ferrer reports 61 new cases |
| 3/20/20 | (V) Mayor announces a new resource for those who lost thier jobs |
| 3/22/20 | COVID Updates |
| 3/22/20 | (V) It is critical that residents stay in their homes |
| 3/23/20 | Info on COVID testing |
| 3/23/20 | Officials provide updates on COVID |
| 3/23/20 | (V) Mayor gives latest efforts on solving the COVID pandemic |
| 3/24/20 | (V) Officials discuss the mental health effects of COVID |
| 3/24/20 | (V) Mayor gives update on expanding testing efforts |
| 3/25/20 | (V) Russell Westbrook talks about the the Mayor's fund |
| 3/25/20 | Schedule a COVID test |
| 3/25/20 | (V) Officials deliver COVID updates |
| 3/26/20 | (V) LADWP moratorium on water and power shut offs extended. |
| 3/26/20 | (V) Assuring residents that food supply lines are healthy |

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| 3/26/20 | (V) Aram Sahakian joins us live from EOC for message on COVID |
| 3/28/20 | Homebodies save lives! |
| 3/28/20 | Info on COVID testing - En Espagnol |
| 3/28/20 | USNS bringing medical care to Port of LA |
| 3/30/20 | (V) Mayor shares more shelters are being opened |
| 3/30/20 | COVID Businss Ambassador Program |
| 3/30/20 | Call this # if you are feeling stressed or depressed |
| 3/31/20 | Latest update from the Mayor |
| 3/31/20 | Mayor closes Farmers Markets |
| 3/31/20 | Streets LA COVID response overview |
| 4/2/20 | Angelenos should wear non-medical face masks in public |
| 4/2/20 | (V) Dr. Barbara Ferrer discusses face coverings |
| 4/3/20 | Stay informed with NotifyLA |
| 4/6/20 | Non-medical face mask examples |
| 4/6/20 | (V) Maria Hall Brown finds out morea bout LA City's reponse to COVID |
| 4/6/20 | Check in with friends and family members |
| 4/6/20 | How to handle stress during COVID |
| 4/6/20 | New billboards aroung LA |
| 4/6/20 | Food Security |
| 4/6/20 | (V) Fire and Police chiefs share updates |
| 4/7/20 | Donation Management |
| 4/7/20 | COVID Testing |
| 4/7/20 | EOC Repost |
| 4/7/20 | (V) City guide on mask |
| 4/7/20 | (V) Updates from the Mayor |
| 4/7/20 | Holy Days from home |
| 4/8/20 | Help for small buisnesses |
| 4/8/20 | (V) Mayor requires workers to wear masks |
| 4/8/20 | City parks closed to the public |
| 4/8/20 | City parks closed to the public - En Espagnol |
| 4/9/20 | Partnership with Verizon for LAUSD |
| 4/9/20 | (V) Aram Sahakian joins us live from EOC to talk about resource acquisition |
| 4/9/20 | (V) Mayor increases testing for vulnerable Angelenos |
| 4/9/20 | IRS tax relief |
| 4/10/20 | Interpersonal Violence |
| 4/13/20 | Worker protection order for essential businesses |
| 4/13/20 | Safer at home extended to 5/15/20 |
| 4/13/20 | (V) Maria Hall Brown meets with Aram Sahakian |
| 4/13/20 | COVID myths |
| 4/14/20 | findhelp.org |
| 4/14/20 | COVID Daily Data Summary |
| 4/14/20 | Angeleno Card for financial assistance |
| 4/15/20 | Food resouces for vulnerable and seniors |
| 4/15/20 | Information for older adults |
| 4/15/20 | (V) Learn how to protect your those who are vulnerable |
| 4/15/20 | (V) Rent payments, evictions and more |
| 4/15/20 | (V) Maor discusses new antibody testing |
| 4/16/20 | Medication delivery using smart phone |
| 4/16/20 | Medication delivery using smart phone apps |
| 4/17/20 | (V) Medical relief center up and running at LA Convention Center |
| 4/17/20 | (V) City Hall lit for healthcare workers |
| 4/18/20 | Food delivery services |
| 4/22/20 | Faith-based organizations making a difference during COVID |
| 4/22/20 | Call 3-1-1 for assistance |
| 4/23/20 | (V) Mayor talks to youths about COVID |

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| 4/23/20 | Check on your neighbors - RYLAN |
| 4/24/20 | McDonald's donation to EOC |
| 4/27/20 | Burning out on COVID? |
| 4/27/20 | (V) Critical LA staff members talk about COVID |
| 4/28/20 | LA Times discusses receiving COVID info |
| 4/29/20 | Free COVID testing to ALL residents |
| 4/30/20 | Mental health during COVID |
| 5/1/20 | (V) Lawsuits against non-FDA approved testing |
| 5/5/20 | (V) Mayor discusses reopening |
| 5/5/20 | Thank you to park rangers for assisting with COVID testing |
| 5/5/20 | Thank you to BAPS Charites for donating supplies |
| 5/6/20 | Road to Recovery |
| 5/6/20 | Thank you to Super Coffee for donating |
| 5/6/20 | Thank you to Ring for donating masks |
| 5/6/20 | LAUSD will be starting August 18, 2020 |
| 5/6/20 | LA Represents |
| 5/6/20 | LA Represents - En Espagnol |
| 5/7/20 | (V) LAFD addressing EOC focus during COVID |
| 5/7/20 | Thank you to CORE for donating masks & assisting with testing |
| 5/8/20 | BAPS Charities donations |
| 5/8/20 | What is open? |
| 5/8/20 | Face coverings required at LAX |
| 5/8/20 | You are not alone |
| 5/11/20 | Domestic Violence |
| 5/11/20 | Price gouging |
| 5/11/20 | Social Services |
| 5/11/20 | What renters should know during COVID |
| 5/11/20 | Support local community recovery |
| 5/12/20 | Coping with grief during COVID |
| 5/12/20 | Stay up to date on City operations during COVID |
| 5/12/20 | FREE hot lunches from DOD |
| 5/12/20 | Rules for beaches reopening |
| 5/13/20 | State officials announce latest COVID facts |
| 5/13/20 | Newsom announces COVID testing increase |
| 5/13/20 | Cal Office of Emergency Services distributes 11 million masks |
| 5/13/20 | Newsom extends deadlines |
| 5/13/20 | US SBA makes EIDLs available to agricultural businesses |
| 5/13/20 | Public Health provides guidance for dental care |
| 5/13/20 | Project Roomkey |
| 5/13/20 | Newsom announces Project Roomkey |
| 5/13/20 | Beaches reopening |
| 5/14/20 | Workers comp for workers who contract COVID while working |
| 5/14/20 | All Angelenos required to wear a mask |
| 5/14/20 | All Angelenos required to wear a mask - En Espagnol |
| 5/18/20 | How to hike safely |
| 5/18/20 | How to hike safely - En Espagnol |
| 5/18/20 | Guidance for Angelenos in new reality |
| 5/18/20 | Guidance for Angelenos in new reality - En Espagnol |
| 5/18/20 | Buisness owner info during COVID |
| 5/18/20 | COVID roadmap to recovery |
| 5/18/20 | Proper face covering |
| 5/18/20 | Picking up takeout food |
| 5/18/20 | Underlying health condition lead to higher risk of COVID |
| 5/18/20 | Free emergency meals for seniors |
| 5/18/20 | (V) Social Distancing |

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|---|---|
| 5/20/20 | Wearring facemasks |
| 5/20/20 | COVID resource list |
| 5/20/20 | Waiting on test results? Check spam folder |
| 5/26/20 | Free COVID testing |
| 5/26/20 | Free COVID testing - En Espagnol |
| 5/26/20 | News regarding LA County reopening |
| 5/27/20 | Friendship Line California |
| 5/28/20 | What is OPEN & CLOSED - Recreation |
| 5/28/20 | What is OPEN & CLOSED - Businesses |
| 5/28/20 | Healthcare businesses are OPEN |
| 5/28/20 | (V) Mayor announces retail stores can reopen |
| 5/28/20 | LA Renters Relief Program |
| 5/28/20 | Safer LA - Retail update |
| 5/28/20 | Safer LA - House of worship update |
| 5/28/20 | Cal HOPE and Red Cross help line |
| 5/29/20 | Proper disposal of PPE |
| 5/30/20 | Tips for Stayng Healthy and Safe - Informagente interview |
| 6/4/20 | What to do after extended exposure at public gatherings |
| 6/8/20 | Support if you lost a loved one during COVID |
| 6/10/20 | Get tested if you've been to a protest |
| 6/10/20 | Phase 3 of reopening beginning |
| 6/15/20 | Avoid gathering in groups |
| 6/15/20 | Free testing available |
| 6/15/20 | Updates on reopening |
| 6/15/20 | Updates on reopening - En Espagnol |
| 6/15/20 | Symptoms of COVID |
| 6/15/20 | Stress during COVID |
| 6/16/20 | Take these steps to prevent COVID |
| 6/16/20 | Support local businesses during COVID |
| 6/16/20 | SBA offering EIDL to those impacted by COVID |

| Nextdoor | |
|---|---|
| Date | Post |
| 01/31/2020 | Coronavirus Update |
| 02/06/2020 | Coronavirus- Public Health Updates Guidance in Accordance with CDC Declaration of Public Health Emergency |
| ########## | Los Angeles' Emergency Management Department's Response to COVID-19 |
| 03/03/2020 | Keep our community healthy by following the CDC's recommendations |
| 03/08/2020 | Tips to Keep Your Neighborhood Healthy |
| 03/16/2020 | Mayor Garcetti announces new measures to prevent the spread of COVID-19 |
| 03/18/2020 | A Message to Our RYLAN Communities |
| 03/19/2020 | Re: A message to Our RYLAN Communities |
| 03/28/2020 | Stay Connected |
| 03/30/2020 | Caring for Someone with COVID-19 |
| 04/06/2020 | How to Handle Stress During the COVID-19 Outbreak |
| 04/09/2020 | Neighbors, can you help today? |
| 04/08/2020 | Use of Cloth Face Coverings to Help Slow the Spread of COVID-19 |
| 4/13/2020 | Creative Ways to Handle Stress During the COVID-19 Outbreak |
| 04/15/2020 | Information for Older Adults During COVID-19 |
| 04/27/2020 | Burning out on the pandemic? You're not alone. |
| 05/05/2020 | They say parenting is the hardest job. Try it during a pandemic. |
| 05/08/2020 | "Safer at Home" Modifications |
| 05/11/2020 | Beware of the fake COVID letter circulating |
| 05/20/20 | Ok, we have to wear face coverings now. Where? And Why? |
| 05/31/2020 | Curfew- 5/31/2020 |
| 06/01/2020 | LA County Curfew- 06/01-02/2020 |
| 06/03/2020 | https://nextdoor.com/post/150424895?init_source=copy_link_share |

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| Link |
| https://nextdoor.com/post/135684738?init_source=copy_link_share |
| https://nextdoor.com/post/136241827?init_source=copy_link_share |
| https://nextdoor.com/post/139024348?init_source=copy_link_share |
| https://nextdoor.com/post/139343970?init_source=copy_link_share |
| https://nextdoor.com/post/139742785?init_source=copy_link_share |
| https://nextdoor.com/post/140562003?init_source=copy_link_share |
| https://nextdoor.com/post/140856987?init_source=copy_link_share |
| https://nextdoor.com/post/141069523?init_source=copy_link_share |
| https://nextdoor.com/post/142408620?init_source=copy_link_share |
| https://nextdoor.com/post/142714022?init_source=copy_link_share |
| https://nextdoor.com/post/143603809?init_source=copy_link_share |
| https://nextdoor.com/post/143861448?init_source=copy_link_share |
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| https://nextdoor.com/post/144557299?init_source=copy_link_share |
| https://nextdoor.com/post/144770671?init_source=copy_link_share |
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| https://nextdoor.com/post/147174947?init_source=copy_link_share |
| https://nextdoor.com/post/147530952?init_source=copy_link_share |
| https://nextdoor.com/post/147782495?init_source=copy_link_share |
| https://nextdoor.com/post/148777258?init_source=copy_link_share |
| https://nextdoor.com/post/149939963?init_source=copy_link_share |
| https://nextdoor.com/post/150171378?init_source=copy_link_share |
| https://nextdoor.com/post/150424895?init_source=copy_link_share |

| Emergency Management Department Website | |
|---|---|
| Date | Post |
| 01/30/2020 | Novel Coronavirus Update |
| 02/28/2020 | COVID-19 |
| 03/23/2020 | SALUS COVID-19 Map |
| 04/06/2020 | How to Handle Stress During the COVID-19 Outbreak |
| 04/20/2020 | Creative Ways to Handle Stress During the COVID-19 Outbreak |
| 04/15/2020 | Information for Older Adults During COVID-19 Outbreak |
| 04/20/20 | Faith-Based Organizations Making a Difference |
| 04/24/2020 | Burning Out on the Pandemic? You're Not Alone |
| 05/06/2020 | They Say Parenting is the Hardest Job. Just Try it During a Pandemic |
| 05/08/2020 | LA City Public Information Update |
| 05/08/2020 | Coping with Grief During COVID-19 |
| 5/19/2020 | OK, We Have to Wear Face Coverings Everywhere Now. Where? And Why? |
| 06/05/2020 | Activities and Businesses Open in LA County |
| 06/19/2020 | SBA and CARES Act Information for the Business Community |

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| Link |
| https://emergency.lacity.org/blog/novel-coronavirus-update |
| https://emergency.lacity.org/blog/covid-19 |
| https://emergency.lacity.org/blog/salus-covid-19-map |
| https://emergency.lacity.org/blog/how-handle-stress-during-covid-19-outbreak |
| https://emergency.lacity.org/blog/creative-ways-handle-stress-during-covid-19-outbreak |
| https://emergency.lacity.org/blog/information-older-adults-during-covid-19-outbreak |
| https://emergency.lacity.org/blog/faith-based-organizations-making-difference |
| https://emergency.lacity.org/blog/burning-out-pandemic-you-re-not-alone |
| https://emergency.lacity.org/blog/they-say-parenting-hardest-job-just-try-it-during-pandemic |
| https://emergency.lacity.org/blog/la-city-public-information-update |
| https://emergency.lacity.org/blog/coping-grief-during-covid-19 |
| https://emergency.lacity.org/blog/ok-we-have-wear-face-coverings-everywhere-now-where-and-why |
| https://emergency.lacity.org/blog/activities-and-businesses-open-la-county |
| https://emergency.lacity.org/blog/sba-and-cares-act-information-business-community |

# EXHIBIT “H”

Instagram Search Log In Sign Up

readyla • Follow

**readyla** Mayor Garcetti has signed into action a Declaration of Local Emergency. This helps the City and the Emergency Management Department (EMD) more easily mobilize resources, supplies, and funding to better coordinate, prepare, and respond to the novel coronavirus (COVID-19). The City's Emergency Operations Center is currently working Citywide to ensure

39 likes

MARCH 4

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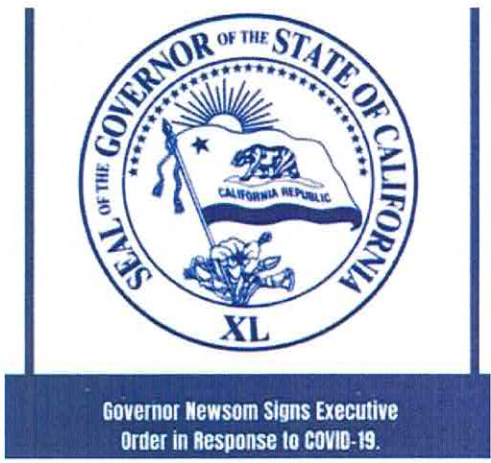
More posts from readyla


SEAL OF THE GOVERNOR OF THE STATE OF CALIFORNIA
CALIFORNIA REPUBLIC
XL
Governor Newsom Signs Executive Order in Response to COVID-19.

g In to Instagram

g in to see photos and videos from friends and discover other accounts you'll love.

# EXHIBIT “I”

| Sent On |
| --- |
| Mar 27, 2020 08:37:08 PDT |
| Mar 27, 2020 17:59:30 PDT |
| Mar 23, 2020 18:00:34 PDT |
| Mar 16, 2020 19:40:22 PDT |
| Mar 16, 2020 08:03:14 PDT |
| Mar 15, 2020 20:07:56 PDT |

| Message Body |
| --- |
| Please visit Coronavirus.LACity.org/Testing to find out if you are eligible for free COVID-19 testing by the City of L.A. Schedule an appointment now.<br><br>Por favor visita la pagina Coronavirus.LACity.org/Testing para determinar si eres elegible para recibir una prueba de detección del COVID-19 gratis ofrecida por la Ciudad de L.A. Haz una cita ahora. |
| LA City Safer at Home order to slow COVID-19 spread still in place. https://coronavirus.lacity.org |
| Go to http://Coronavirus.LACity.org/Testing to learn more about new COVID-19 testing available from the City of L.A. and to see if you're eligible.<br><br>Visite la página http://Coronavirus.LACity.org/Testing para aprender más sobre las nuevas pruebas de COVID-19 disponibles en la ciudad de L.A. y |
| Mayor Garcetti announces relaxed parking enforcement as part of response to COVID-19. Read more: http://Mayor.LA/OSdG30qqmBH |
| L.A. City has closed bars, nightclubs, restaurants (except takeout/delivery), entertainment venues, and more to help slow the spread of COVID-19. Mayor.LA/jqKV30qq6m6<br><br>La ciudad de Los Ángeles ha cerrado bares, discotecas, restaurantes (excepto comida para llevar / a domicilio), lugares de entretenimiento y más para ayudar a frenar la propagación de COVID-19. |
| Mayor Garcetti is announcing new orders to help slow the spread of COVID-19. Watch now: Facebook.com/MayorofLA |

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| Mar 12, 2020 17:52:12 PDT |
| Mar 19, 2020 19:57:17 PDT |
| Apr 02, 2020 10:15:58 PDT |
| Apr 03, 2020 08:42:41 PDT |

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| Today, Mayor Garcetti and local officials shared updates about the City's actions to help protect the public and slow the spread of COVID-19.<br><br>Watch here: Mayor.LA/2GDu30qpppph<br><br>To help combat the virus' spread, please take common sense precautions: wash your hands thoroughly and frequently. Stay home if you feel sick. Keep extra food and medical supplies around, and practice social distancing.<br><br>To learn more about how you can help stop the spread of the novel coronavirus, visit lamayor.org/coronavirus<br><br>***<br><br>Hoy, el alcalde Garcetti se reunió con oficiales locales para compartir noticias sobre las acciones de la ciudad para ayudar a proteger el público y retrasar la propagación del coronavirus.<br><br>Vea aqui: Mayor.LA/2GDu30qpppph<br><br>Para ayudar a combatir la propagación del virus, por favor tome medidas prácticas: lave sus manos bien y con frecuencia. Quédese en casa si se siente enfermo. Mantenga comida y suministros médicos en su cas, y practique el distanciamiento social. |
| Mayor Garcetti issues "Safer at Home" emergency order — ordering all residents of the City of L.A. to stay inside their residences and immediately limit all non-essential movement. Coronavirus.LACity.org<br><br>El alcalde Garcetti anuncia la orden de emergencia "Más Protegidos en Casa", ordenando a todos los residentes de la Ciudad de Los Ángeles que permanezcan dentro de sus residencias y limiten de inmediato las actividades que no son esenciales. Coronavirus.LACity.org |
| Go to Coronavirus.LACity.org/Testing to see eligibility requirements and sign up for free COVID-19 testing today. Every test helps keep L.A. safe.<br><br>Visite el sitio Coronavirus.LACity.org/Testing para ver los requisitos de elegibilidad y regístrese hoy para obtener una prueba de detección gratuita de COVID-19. Cada prueba ayuda a mantener sana a nuestra ciudad. |
| Go to Coronavirus.LACity.org/FaceCovering to read new guidance from the City of L.A. that all Angelenos should wear non-medical cloth face coverings when in public.<br><br>Visite Coronavirus.LACity.org/FaceCovering para aprender mas sobre la nueva recomendación de la ciudad de Los Ángeles que explica porque todos los |

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| Apr 14, 2020 08:27:41 PDT |
| Apr 20, 2020 16:25:48 PDT |
| May 06, 2020 20:53:12 PDT |
| May 13, 2020 20:42:08 PDT |

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| Visit Coronavirus.LACity.org/Testing for information on free COVID-19 testing now available to all L.A. County residents with symptoms. Learn more and book an appointment.<br><br>Visita Coronavirus.LACity.org/Testing para más información sobre las pruebas de detección de COVID-19 gratis disponibles ahora para todos residentes con síntomas en el condado de Los Ángeles. Aprenda más y haga una cita. |
| Experiencing COVID-19 symptoms? Go to Coronavirus.LACity.org/Testing to sign up for a free test today. 30 locations open across L.A. County.<br><br>¿Tienes síntomas de COVID-19? Visita la página Coronavirus.LACity.org/Testing para inscribirse para una prueba gratis hoy. Hay 30 sitios abiertos en el condado de L.A. |
| Go to Coronavirus.LACity.org/SaferLA for info on adjustments to the Safer at Home order — including some businesses allowed to offer curbside pickup and the reopening of public trails.<br><br>Visita Coronavirus.LACity.org/SaferLA para información sobre las modificaciones a la orden Más Protegidos en Casa, incluyendo el permiso para algunos |
| All Angelenos are now required to wear face coverings when they leave the house. Visit Coronavirus.LACity.org/FaceCovering for more details, including exceptions for small children or those with disabilities.<br><br>Se requiere que todos angelinos lleven coberturas faciales cuando salgan de la casa. Visita Coronavirus.LACity.org/FaceCovering para más detalles, incluyendo excepciones para niños pequeños o personas con discapacidades. |